

HW Comments that Pertain to Environmental Justice/ Just Transition Workgroup

Governance

Comments			
Concerns	Entity/Entities	Recommendations	Entity/Entities
A lack of a clear decision-making structure that includes meaningful participation and representation of impacted communities	Multnomah County, OHA	The decision making structure must be both simplified and clarified to ensure a clear oversight structure that includes meaningful representation of impacted communities. We define such representation as at least 40% of relevant parties representing impacted communities.	Multnomah County, The Nature Conservancy
Prevent hotspots of pollution and carbon emissions. Prohibit trading and carbon offsets by emitters in Environmental Justice (“EJ”) communities in Oregon and linked markets. Require minimum reduction standards from polluters, particularly in most impacted communities.	Coalition of Communities of Color	Rural communities and working lands should play an important role in carbon pricing policy. A significant amount of resources will need to be dedicated to emission reduction projects in agriculture, ranching, and forestry. This can and should be done in disadvantaged communities and can and should be guided by the best available science on best practices for climate smart natural resource management, with an eye to practices that both help mitigate greenhouse gas emissions and help working lands adapt to the effects of climate change.	Pinchot Institute for Conservation
Prevent and mitigate displacement. Recognize that as communities receive investments, particularly climate or environmental investments, increased desirability of neighborhoods can lead to displacement and gentrification. Consider and mitigate these potential impacts.	Coalition of Communities of Color, OHA	As should be the case with the treatment of other sectors, the legislative process and subsequent rule-making processes should clearly outline the role of working lands and rural communities in the Climate Investment Fund and Just Transition Fund created by S.B. 1070.	Pinchot Institute for Conservation

<p>We are strongly opposed to this legislation preempting local efforts and therefore it needs to state that it does not limit local communities' ability to set their own GHG emissions reductions goals that go beyond the minimum required at the state level.</p>	<p>Rogue Climate</p>	<p>Prevent any increase in and/or reduce the emissions of toxic air contaminants or criteria air pollutants. Consider the potential for direct, indirect, and cumulative emission impacts from market-based compliance mechanisms, including localized impacts in communities that are already adversely impacted by air pollution. The full impact of pollution upon a given area should be taken into account, even if all of the vehicles of pollution are not coalesced within the same regulatory category. Comprehensive air quality regulations like Cleaner Air Oregon are essential complements to Cap and Invest. Taking into account covered and non-covered entities is the most transparent pathway to ensure that the concerns regarding disproportionate impacts and a just transition are taken into account, even if all of those entities will not be covered within this program.</p>	<p>Coalition of Communities of Color</p>
<p>The role of government in a market-based system should be clear and defined in order for a market to perform rationally and fairly in response to the policy goal of government. Oregon's regulators should not regularly intervene in the market to create ordained outcomes.</p>	<p>Northwest Requirements Utilities (NRU) & Oregon People's Utility District Association (OPUDA)</p>	<p>Responsible State agencies will work with governments and communities statewide to identify vulnerabilities and strategies. Require inclusion of anti-displacement strategies when administering program proceeds, including sustainability plans.</p>	<p>Coalition of Communities of Color, OHA</p>

<p>General Process and Approach: One general comment we offer is less about specific changes and perhaps more about the process and approach. As we currently understand the SB1070 approach, it contemplates legislation followed by a 3-year rulemaking process. This is complex legislation that will affect small and large communities and nearly every economic sector in Oregon. It makes sense to invest more time upfront to ensure clarity on intent and effect of the statutory language with the possibility and goal of actually shortening the rule-making timeframe. If the legislation does not provide adequate and clear guidance and safeguards, the rulemaking will be fraught with issues.</p>	<p>Northwest Requirements Utilities (NRU) & Oregon People’s Utility District Association (OPUDA)</p>	<p>Create an adaptive management plan, including, but not limited to localized air quality impacts from cap-and-trade covered entities under the regulation, actualized benefits from program proceeds (also mapped online), and workforce/contractor diversity associated with project implementation. Ensure state and agencies have statutory duty to measure and publicly report on the equity of proceed use and to increase efficiency and efficacy of investments.</p>	<p>Coalition of Communities of Color</p>
		<p>A labor voice should be incorporated into advisory and oversight bodies associated with climate programs.</p>	<p>AFL-CIO</p>
		<p>On the economic development front, we are especially concerned that responsible contractor, apprenticeship, PLA and high road standards be made required, not just recommended. And we would like to see further thought given to how we might incentivize the use of domestically manufactured materials and equipment on Climate Investment funded projects.</p>	<p>AFL-CIO</p>
		<p>Include a mechanism to review and update methodologies based on new data. Building in the flexibility to consider new data and research will help to ensure that Oregon is making science-based decisions.</p>	<p>OHA</p>

		<p>The Port recommends that the cap-and-invest program design should include an economic analysis to demonstrate there will not be adverse economic impacts over other alternatives and to identify potential impacts to at-risk and trade-dependent industries and the mechanisms for monitoring and addressing those impacts. This should include a rigorous evaluation to tailor program design alternatives to ensure Oregon’s emission reduction goals are met, while ensuring the maximum achievable economic protections. Such an evaluation should identify optimum offset levels, amount of free allowances, price limits, surplus allowances, and identify the mechanism to monitor the program and make necessary adjustments once the program is implemented.</p>	<p>Port of Portland</p>
		<p>Meaningful representation on rule-making and grant committees by communities most impacted by climate change, Tribal members, and other underrepresented groups. The committee structure could be simplified as long as there is meaningful--and not tokenized--representation by communities and businesses most impacted by climate change. There should not be an over-representation of regulated industries.</p>	<p>Renew Oregon</p>
		<p>Providing technical assistance to businesses, non-profits, and community economic development entities composed of, or that serve, underrepresented communities. It is important that the transition to a clean economy is inclusive and this will help ensure broad participation in applying for investment opportunities.</p>	<p>Renew Oregon</p>

		Strengthen the purpose statement, priorities and principles to help guide rulemaking and implementation. Clear and consistent priorities and principles. We would like to see stronger direction to allow for investments of auction proceeds in natural and working lands to increase carbon sequestration and provide co-benefits for adaptation to climate change and ocean acidification.	The Nature Conservancy
		Local Decision Making and Authority: One key part of flexibility is to leave detailed implementation of decision-making to local governing boards where appropriate. This flexibility will allow regulated COUs to implement the broad intent of the "invest" part of SB1070 to meet local needs rather than requiring "one-size-fits-all" approaches.	Northwest Requirements Utilities (NRU) & Oregon People's Utility District Association (OPUDA)

Note: The "concerns" and "recommendations" columns do not correspond in each row and are independent columns. Also, we tried to capture as many comments for recommendations/concerns that relate to the Environmental Justice/Just Transition subcommittee and recognize that we may have missed a few that are related. Similarly, if any entity is seen as having similar concerns or recommendations we added it to a column as to not duplicate work but apologize if it is not the representation of any individual organization or if we missed an organization with similar concerns/recommendations.

HW Comments that Pertain to Environmental Justice/ Just Transition Workgroup Designation of Impacted Communities

Comments			
Concerns	Entity/Entities	Recommendations	Entity/Entities
What does a fair outcome look like? Is this defined in economic terms, environmental terms, social terms or some other metric?	Oregon Business & Industry (OBI)	Equity is the fair distribution of costs and benefits as our state transitions to a new clean, energy economy. Equitable policy prevents additional burdens on most impacted communities while reducing existing disparities and historical inequities. Research shows economic inequality undermines economic development, jobs, growth, and political stability. Promoting equity is also important to ensure durability of policy in a state with rapidly growing communities of color and growing inequality.	Coalition of Communities of Color, NW Energy Coalition
Impacts and costs to rural communities and natural resource related industries.	Sustainable Northwest, Rogue Climate	Such mechanisms include a way to reach households that do not file taxes, as well as monthly energy or fuel/transportation assistance for the lowest income households. A proportional reduction of personal income taxes is not sufficient, unless accompanied by other measures targeted at most impacted communities. We must reduce risks, enhance benefits and improve resilience in most impacted communities.	Coalition of Communities of Color

<p>We are concerned that SB 1070 as it is currently drafted misses the opportunity to meaningfully engage rural communities by overlooking forests and other working lands. Forests and other lands are often the backbone of rural economies. Leaving out investment in these essential lands – which also sequester enormous amounts of carbon, provide irreplaceable wildlife habitat, and are essential to climate change adaptation – would be a missed opportunity to both to harness the power of these natural systems for climate benefits and engage an often overlooked constituency which has a key role to play in Oregon’s emerging climate change policies.</p>	<p>Pacific Forest Trust</p>	<p>Identify “most impacted communities.” The State must identify most impacted communities based on racial and socioeconomic demographics, overlaid with environmental and public health data (“Cumulative Impacts Test”). This analysis is required to accurately identify communities most vulnerable to climate change as well as which communities are eligible for proceeds. (See forthcoming PSU Carbon Pricing and Most Impacted Communities research). Consider adapting comprehensive mapping methodology (CalEnviroScreen) tool for Oregon context.</p>	<p>Coalition of Communities of Color</p>
<p>Oregon’s rural and urban low-income people and people of color face the greatest peril from climate change. These communities -- already suffering from clear economic, health and environmental disparities -- also have the fewest resources to adapt to the impacts of climate change, including more severe and frequent heat, fires, storms, droughts and floods. Nonetheless, Oregon’s rural and urban low-income people and people of color are underrepresented in climate decision-making. Further, it is important to recognize that all climate change solutions are not created equal, that poorly designed climate solutions can further burden vulnerable communities -- in the era of climate change, a rising tide does not lift all boats.</p>	<p>Coalition of Communities of Color</p>	<p>We would also like to see the definition of “impacted communities” strengthened, so that it clearly includes workers and communities that are affected by plant closures and layoffs attributable to cap and invest policy implementation, where relevant. Provisions that address the need for flexibility (e.g. free allowances) are necessary to prevent leakage and job loss in our manufacturing sector, and the provisions currently in SB 1070 should be retained. Related to that, we would like to see the just transition options for laid-off workers expanded. Retraining is an inadequate solution and must be joined with other efforts to make these workers whole – extended unemployment benefits, mental health and other services, and bridges to retirement for older workers.</p>	<p>AFL-CIO</p>

<p>Does the policy promote Environmental Justice? Climate policy should aid the state’s most environmentally impacted and socioeconomically disadvantaged communities by reducing environmental health risks; expanding access to beneficial goods and services; and increasing both community-level resilience and access to resources from public investments in low-carbon goods and services.</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, NW Energy Coalition</p>	<p>Account for impacts to migrant farmworker communities within the investment program. The draft proposed methodology to distribute revenue is based on stationary sources of air pollution and social vulnerability by census tract, which will not capture migrant farmworkers, who are among the most vulnerable populations and who may not reside in a specific census tract.</p>	<p>OHA</p>
<p>Does the policy promote economic equity? Climate policy should generate high-quality, career-track, and family-sustaining jobs in clean economic growth sectors; include specific efforts to create pipelines to these jobs for workers from disadvantaged communities; and contain supports for workers and communities in carbon- intensive industries at risk of disruption or decline due to climate policy.</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, NW Energy Coalition</p>		
<p>Protect most impacted communities locally and globally. Oregon must ensure that a carbon pricing program does not harm low-income people and people of color (“most impacted communities”). Certain carbon pricing approaches produce disparate, negative impacts on most impacted communities, while benefiting other people, places and institutions. A combination of mechanisms will be required to ensure that most impacted communities are not disproportionately impacted by higher costs or additional environmental burdens.</p>	<p>Coalition of Communities of Color, Melissa Cribbins - Coos County Commissioner</p>		

<p>Potential Adverse Local Impacts on Rural, Small and Disadvantaged Communities: While we believe the a cap-and-trade/invest approach has the potential to achieve the most cost effective reductions in GHGs emissions, it is critical to fully understand not just the macro-level and theoretical impacts, but the micro-level and actual impacts. A large negative local impact in rural Oregon can easily be lost in the noise when looking at the entire state economy.</p>	<p>Northwest Requirements Utilities (NRU) & Oregon People’s Utility District Association (OPUDA), Melissa Cribbins - Coos County Commissioner</p>		
--	---	--	--

Note: The "concerns" and "recommendations" columns do not correspond in each row and are independent columns. Also, we tried to capture as many comments for recommendations/concerns that relate to the Environmental Justice/Just Transition subcommittee and recognize that we may have missed a few that are related. Similarly, if any entity is seen as having similar concerns or recommendations we added it to a column as to not duplicate work but apologize if it is not the representation of any individual organization or if we missed an organization with similar concerns/recommendations.

HW Comments that Pertain to Environmental Justice/ Just Transition Workgroup Parameters Around Investment

Comments			
Concerns	Entity/Entities	Recommendations	Entity/Entities
A lack of meaningful discussion on mechanisms to protect impacted communities from adverse economic consequences as a result of the policy.	Multnomah County, AFL-CIO	We recommend that reinvestment revenues subject to the Highway Trust Fund be prioritized for areas that bear the greatest burden of transportation-related air toxics emissions and have shown success at reducing GHG emissions, while ensuring representation of impacted communities and local control of dollars.	Multnomah County, Neighbros for Clean Air, OHA, Metro
We were both inspired and concerned by the story presented by the Warm Springs tribal members who described their experience with registering carbon offsets for the California market. While we understand that the specifics of the carbon offset market will be determined largely through rule-making, we hope Oregon's market will consider the limitations and weaknesses of California's current regulatory framework so that validation of carbon offset projects can be streamlined and benefits reach target communities and individuals faster.	1000 Friends	Oregon should adopt similar investment strategies in affordable and middle income housing, transit, and walking and bicycling facilities that meet several bottom lines: cleaning the air of unhealthy pollutants and helping communities of color and low-income neighborhoods hit hardest by climate change. The benefits from this policy could be even more pronounced in Oregon, where almost 40% of the state's greenhouse gas emissions come out of the tailpipes of automobiles and light trucks, and moreover, where we also have an in-place structure of compact urban growth boundaries that amplify the magnitude of these investments because they are more effective here.	1000 Friends, OHA, Port of Portland, Metro, Rogue Climate

<p>We particularly support the policy’s focus on equity, taking into account that the burdens of climate change fall disproportionately on Oregon’s more vulnerable underserved and lower income urban and rural communities and economies.</p>	<p>1000 Friends</p>	<p>Preservation of Oregon’s carbon-absorbing private, farms, forests, and ranchlands is another one of the most significant carbon mitigation investments the state can make. These investments can take many forms. Oregon must be prepared to invest in working land easements if we are to keep these lands intact and available to feed future generations of Oregonians and others. Investments from the Clean Energy Jobs Act can be an integral source of funding for the working lands easements farmers and ranchers and foresters will need to make as they transfer their land from one generation to Oregon’s newest farmers and ranchers.</p>	<p>1000 Friends</p>
<p>My main concern is that an adequate portion of the accrued funds are applied to resources for individuals and communities that are most affected by the GHG reductions. Also a major portion of the funds should strongly support the development of renewable energy solutions.</p>	<p>Dennis Sobolik, Ashland</p>	<p>Future rule-making efforts should ensure investments are made to remove the burdens of a changing climate from, and bring the benefit of clean energy jobs and economies to, rural and urban underserved and vulnerable communities and communities of color, both directly and indirectly.</p>	<p>1000 Friends, Rogue Climate</p>
<p>Will regulated entities have access to or compete for revenues derived from program implementation?</p>	<p>Oregon Business & Industry (OBI)</p>	<p>In theory, offset investment credits are a good concept; they must be closely monitored so as not to be abused. The credits should be progressive in nature to promote the move towards renewable energy and not as a crutch to keep doing “business as usual”.</p>	<p>Dennis Sobolik, Ashland</p>

<p>We understand that reducing emissions has the potential to impose burdens on the workforce as fossil fuel generation and infrastructure is replaced by renewable energy generation and infrastructure. To minimize the dislocation to workers, we strongly support both the requirement for High Road Standards in contract awards and the allocation of a proportion of any funds accruing from the auction of allowances to a just transition fund to support retraining.</p>	<p>Southern Oregon Climate Action Now (SOCAN), AFL-CIO</p>	<p>Invest in projects that reduce greenhouse gas emissions, build resilience to climate impacts, and directly improve local air quality.</p>	<p>Multnomah County, OHA, Metro, Rogue Climate</p>
<p>We also acknowledge that some communities suffer greater health and environmental risk than other from the current fossil fuel economy (for example from the toxic by-products of oil refineries and coal mines). Similarly, we recognize that some communities can be more severely compromised than other from efforts to promote a transition in our energy economy away from fossil fuels and towards renewables. We thus support efforts to assign funds from the auction of allowances specifically to stimulate projects in and serving such communities. Since rural Oregon is particularly disadvantaged economically compared to our more urban centers, we also strongly support the allocation of funds to stimulate renewable energy development projects in rural Oregon.</p>	<p>Southern Oregon Climate Action Now (SOCAN)</p>	<p>We suggest that 25% of the Oregon Climate Investment Fund goes towards the restoration and conservation of forests and watersheds. This would sustain jobs in rural communities, cost-effectively reduce greenhouse gas emissions, and support climate change adaptation efforts. Further, as noted in recent polling for a comparable climate initiative in Washington state, adding the forest and watershed elements to climate investments increased the positive support for that initiative by a full 20%.</p>	<p>Pacific Forest Trust, The Nature Conservancy</p>

<p>The primary goal of SB 1070 should be to facilitate reduction in overall greenhouse gas emissions in Oregon. To the extent revenue is created, it should be prioritized towards that goal to the extent allowed by law. As currently drafted, Section 16 of the draft Clean Energy Jobs Bill specifies that at least 50 percent of money received in the program be distributed to programs located in impacted communities, and at least 40 percent to programs in economically distressed areas. It is unclear whether these proposals are additive, or exclusive. While these are worthy goals, they should not take complete precedence over projects that will accelerate emission reductions in the state.</p>	<p>Blue Planet Energy Law, Carl Fink</p>	<p>Wild Salmon Center wants the cap-and-invest policy to support investments in natural resources to help especially our rural natural resource communities adapt and prosper in the face of serious, negative effects of climate change. Wild Salmon Center especially seeks measures to protect and improve fish habitat and to conserve sufficient and cool water for the communities that depend on these resources. We would like to see greater clarity on the degree to which the policy will support investment in natural resources to assist with resilience to climate change.</p>	<p>Wild Salmon Center, Rogue Climate, The Nature Conservancy</p>
<p>Capping GHG emissions and pollution: Ensure real reductions based on best available science; actively address local and global air quality concerns. Allowances: Significantly limit free allowances; ensure direct investment to support transition of workers in impacted industries. Reinvestment in most impacted communities: Ensure majority of proceeds and contracting opportunities from each covered sector directly benefit most impacted communities in order to mitigate impacts of carbon price and close existing opportunity gaps. Broaden use of the Highway Trust Funds: We need flexibility to transition to a renewable economy; ensure transportation proceeds promote equity and climate resilience. Offsets: Prohibit use of offsets. Invest revenues directly into forest/agriculture projects in Oregon. No price ceiling on emissions allowances; real reductions require a meaningful price on carbon.</p>	<p>Coalition of Communities of Color</p>	<p>An example of an appropriate use of the Investment Grant Program Fund would be to accelerate adoption of carbon reduction technologies by power generators through fund grants or provision of low-cost financing. Having a cap and trade mechanism will help provide financial incentive for generators (and other industrial and commercial emitters) to reduce emissions, but the annual cap reduction and carbon costs may not be sufficient to incent a given entity to make the major capital investments necessary to radically reduce its emission profile in the near term.</p>	<p>Blue Planet Energy Law, Carl Fink</p>

<p>There is no guarantee that these projects will be located in the state of Oregon, thus the benefits and jobs will likely not benefit rural communities in Oregon. CA projects happen all over North America (including Canada and Mexico).</p>	<p>Coalition of Communities of Color</p>	<p>Policy implications are analyzed in the journal Environmental Justice. The authors find scientific support for air filtration in buildings, adjusting air intake locations for buildings, soundproofing, and a few other interventions that could conceivably be funded by proceeds from carbon pricing. Target transportation proceeds to most impacted communities and communities with high transportation cost burden. People of color, low-income households, and rural Oregonians will be especially vulnerable to increased costs in transportation given these communities disproportionately live far from employment.</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, OHA, Metro, Rogue Climate</p>
<p>Mitigate impacts of transportation sector, which is unaddressed in Cap and Invest. We must be intentional about investing in most impacted communities, creating and maintaining complementary policies for pollution reduction (LCFS, diesel reform, Cleaner Air Oregon) and opportunities. We must prohibit offsets in this sector to meet an entity's compliance and prohibit free allowances related to this sector. There is clear evidence of health impacts from living near busy roads, both from air pollution and from noise. Oregon has especially large racial disparities related to disparate exposure to mobile source air pollutants.</p>	<p>Coalition of Communities of Color</p>	<p>Utilities. Do not allocate allowances freely to utility sector; consign allowances and require utilities to auction in market place. Proceeds must be used to mitigate cost impact for low income customers through a combination of direct on-bill rebate (on at least quarterly basis), percentage of income payment plan (PIPP), funding for Oregon Energy Assistance Program (OEAP), and energy efficiency/weatherization programs. Any amount in excess of meeting statewide low-income needs should be directed to on-bill rebates for ratepayers and small businesses.</p>	<p>Coalition of Communities of Color</p>

<p>Economic Equity: Reinvest revenues in ways that reduce disparities and create benefits and opportunities for most impacted communities. Oregon must go beyond cost or harm mitigation. “Without specific intervention, the same market forces that produce wage disparities and inequality in the economy as a whole can be expected to impact the emergent low-carbon industry sectors...” We must create a carbon pricing program that also yields economic, health, environmental and social benefits for urban and rural most impacted communities.</p>	<p>Coalition of Communities of Color, AFL-CIO</p>	<p>Transportation. Proceeds subject to the Highway Trust Fund should be directed to most impacted communities, communities experiencing disproportionate exposure to air toxics and criteria air pollutants associated with transportation, and communities with high transportation cost burdens. DOT must use consistent grant criteria developed through rule making process and in consultation with most impacted communities and/or relevant committees.</p>	<p>Multnomah County, Coalition of Communities of Color</p>
<p>A significant portion of Oregon’s affordable housing is also in need of critical repairs. If these units do not receive the repairs they require, they may fall out of the state’s housing stock entirely and further compound the housing crisis. Such homes are also usually energy inefficient and expensive to heat, and studies have shown that living in substandard housing leads to poor health outcomes. Housing prices and energy costs are two of the greatest financial burdens facing low-income Oregonians, and homes with poor energy efficiency are more expensive to heat and increase our state’s emissions.</p>	<p>Enhabit, Metro, Community Action Partnership of Oregon</p>	<p>Industry. Proceeds should be directed to most impacted communities and to support workers in impacted industries.</p>	<p>Coalition of Communities of Color</p>

<p>The current structure for guiding investments appears to rely too heavily on grants rather than capturing potential efficiencies through formula-based investments.</p>	<p>Enhabit</p>	<p>Target proceeds and additional resources for most impacted communities and workers. Use program proceeds to ensure financial and technical resources are available for most impacted communities to engage in development and oversight of program as well as to apply and access program proceeds. Identify a lead state agency and funding sources for inclusive planning process to mitigate transition losses for workers and communities potentially impacted by industrial decline due to climate policy.</p>	<p>Coalition of Communities of Color, AFL-CIO, Pacific Northwest Carpenters Institute, Rogue Climate</p>
<p>We are concerned that historically, 'offset' Investments have not benefited small and mid---sized farms and ranches. A well designed Oregon 'cap and invest' should create significant new resources for small and mid--sized farms and ranches to adopt practices that promote soil health and soil carbon sequestration, including: managed rotational grazing of livestock, building soil organic matter, increased use of cover crops, diversified crop rotations, reducing or eliminating use of petroleum---based fertilizers, organic transition and research, and leaving land fallow periodically.</p>	<p>Friends of Family Farmers, Organically Grown Companies</p>	<p>Priority hire for historically excluded workers. Ensure priority hire provisions promote job training and apprenticeships, field entry, and access to jobs and projects for minority contractors and workers (historically excluded workers and communities) through all sectors. Utility-scale solar and other projects funded, in whole or in part, through program proceeds must have explicit minority-women targeted-hire goals and job tracking systems.</p>	<p>Coalition of Communities of Color, Rogue Climate</p>

<p>What kinds of projects and programs are envisioned for the several funds and accounts into which cap-and-invest revenues will be deposited? Who may apply for grants and funds? How will the state assure that it is using revenue to address greenhouse gas reductions? A majority of the funds are to be distributed to projects or programs in impacted communities and economically distressed areas. What kinds of projects and programs are envisioned in these areas? How can we assure that revenues collected to drive reductions in greenhouse gas emissions are not used for existing projects and programs that should be funded from other state sources? How can we assure that there is transparency and accountability for the expenditure of revenues?</p>	<p>Northwest Food Processors Association (NWFPA)</p>	<p>Economic benefits: Increased family income and assets. Increase family income (e.g., targeted hiring for living wage jobs). Increase job readiness and career opportunities (e.g., workforce development programs, on-the-job training, support through apprenticeships for most impacted communities). Revitalize local economies and create opportunities for historically excluded business (e.g., increased utilization of local businesses and minority-women businesses).</p>	<p>Coalition of Communities of Color, AFL-CIO, Pacific Northwest Carpenters Institute, Rogue Climate</p>
<p>There is a significant opportunity to achieve public health benefits through climate mitigation strategies. Certain climate mitigation investments can yield considerable health 'co-benefits'.</p>	<p>OHA, Community Action Partnership of Oregon</p>	<p>Economic benefits: Reduced family costs. Rent savings (e.g., affordable housing). Transportation cost savings (e.g., free or reduced cost transit passes, low- and zero-carbon transportation alternatives that are low to no cost for low-income households). Energy cost savings (e.g., weatherization, solar, low-income energy assistance programs, on-bill rebates for low-income households, etc.)</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, OHA, Metro, Community Action Partnership of Oregon</p>
<p>Proceeds must be used to reduce climate pollution and prioritize creating benefits for most impacted communities and economically distressed rural communities. We want to see Oregon accelerate clean energy solutions that will create healthy, livable communities, new economic opportunities, and build resiliency into the future.</p>	<p>Renew Oregon</p>	<p>Mobility and Access to Opportunity. Improve transit service levels on systems/routes that have high ridership of low-income riders. Bring jobs and housing closer together (e.g., affordable housing in transit oriented development, and in healthy, high-opportunity neighborhoods).</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, Metro</p>

<p>How to support investments in reducing GHG emissions from transportation that are not eligible for Highway Fund dollars?</p>	<p>Metro</p>	<p>Sustainable Community Infrastructure and Community Resilience. Improvements that will benefit rural and low-income residents without increasing the risk that they will be displaced. Local community-led climate resilience planning. Sustainable agricultural practices that promote the transitions to clean technology, water efficiency, and improved air quality. Healthy forests and urban greening. Other climate adaptation and resiliency strategies which provide direct benefit to most impacted Communities.</p>	<p>Coalition of Communities of Color, OHA, Rogue Climate</p>
<p>Definitions related to impacted communities, etc., and how they affect the geographic distribution and use of auction proceeds</p>	<p>Metro</p>	<p>Community Identified Priority Needs. An investment will meet an unmet need that has been identified as a high priority in an inclusive process led by disadvantaged community residents and groups.</p>	<p>Coalition of Communities of Color, NW Energy Coalition, Port of Portland, Rogue Climate</p>
<p>How can this bill ensure that moneys raised under the program will be spent on activities that reduce greenhouse gas emissions? There is no assurance provided in the bill that the moneys will be spent to further reduce greenhouse gas emissions as designed.</p>	<p>PGE</p>	<p>Technical Assistance. Provide opportunities for businesses, public agencies, nonprofits, and other community institutions to participate in and benefit from statewide efforts to reduce greenhouse gas emissions. Use program proceeds to ensure financial and technical resources are available for most impacted communities to engage in development and oversight of program as well as to apply/ access program proceeds. Identify a lead state agency and funding sources for inclusive planning process to mitigate transition losses for workers and communities potentially impacted by industrial decline due to climate policy.”</p>	<p>Coalition of Communities of Color, Rogue Climate</p>

<p>It is critical that that the benefits of this bill will go to communities that are most vulnerable to the impacts of climate change. In southern Oregon where our organization is based, those communities include low income communities, rural communities, communities of color, Tribal communities, outdoor workers, people with disability, youth and the elderly.</p>	<p>Rogue Climate</p>	<p>SB 1070 would benefit from clearer objectives and greater detail about how cap-and-invest program revenue should be spent. Priority should be given to projects that both reduce emissions and tackle the state's greatest challenges. By giving precedence to projects that improve Oregon's housing stock and reduce displacement, SB 1070 could protect impacted communities and economically distressed areas while also decreasing residential GHG emissions.</p>	<p>Enhabit, Metro, Community Action Partnership of Oregon</p>
<p>The investments into our rural communities will not start to be seen quickly enough. As the policy is currently written, impacted communities won't see any of the benefits from the bill until 2019. If a cap and invest policy is not passed in the 2017 legislature, we could be looking at 2020 or even later before GHG reductions start to be seen in our state as a result of this policy.</p>	<p>Rogue Climate</p>	<p>Focusing Investments on projects at smaller and mid--sized farms and ranches and on organic practices will help ensure that there are broad and significant positive impacts across rural Oregon.</p>	<p>Friends of Family Farmers, Organically Grown Companies</p>
<p>We are concerned that the benefits that offsets could provide in terms of investment in carbon capture or storage in rural family farms or forestry operations won't stay in Oregon and may just benefit large industry projects or would subsidize projects that private industry should be taking responsibility for on their own. We are also concerned that offsets could create pollution hot spots, or continue to build an international carbon market.</p>	<p>Rogue Climate</p>	<p>The proposal should create a grant program administered through local soil and water conservation districts, or through state agencies like ODA and OWEB, Specifically targeted towards helping smaller and mid--sized farms and ranches adopt practices that help store carbon in soils. The proposal should be amended to also acknowledge that very large CAFOs can be high emitting facilities and if so, such facilities should be subject to the cap on greenhouse gas emissions.</p>	<p>Friends of Family Farmers, Organically Grown Companies</p>

		<p>Revenues should be used to provide incentives, tax credits and grants for companies to implement voluntary measures that reduce greenhouse gas emissions at their facilities. In addition to reducing emissions, projects and programs at industrial facilities will produce efficiencies and facility upgrades that will improve competitiveness, support job retention and creation, and will reduce/prevent leakage.</p>	<p>Northwest Food Processors Association (NWFPA)</p>
		<p>The revenue received from a GHG reduction mechanism should support: investments in clean renewable energy technologies, clean energy research and development, energy efficiency programs and measures, clean advanced non-fossil fuel technologies, environmental remediation activities, low-income energy programs, support and appropriate adaptation measures for impacted communities and displaced workers, and should not be expended or rebated in any way that would result in increased consumption of fossil fuels.</p>	<p>NW Energy Coalition, Rogue Climate</p>
		<p>Can transportation auction revenues pay for new investments in electrified automated vehicle infrastructure? Electrified automated vehicles will almost certainly rely on new broadband-reliant communications systems as an integral part of transportation infrastructure.</p>	<p>Oregon's Citizen Utility Board</p>

		<p>Consider incorporating health co-benefits as a criterion for prioritizing investments. There are methodologies to analyze the health benefits and burdens of proposed investments that can inform program decisions (Mendez MA. 2015). Investments that build social capital (i.e., increased community capacity to adapt and respond to climate stressors, increased levels of civic engagement and connectivity within and among diverse groups) lead to health co-benefits (improved mental and physical health) and greater climate resilience (Aldrich, 2014).</p>	OHA
		<p>Support business innovation and help Oregon's economy. Minimize impacts to low income and rural Oregonians and contribute to a just transition to a low carbon economy. Produce co-benefits to help Oregon adapt to the unavoidable impacts of climate change.</p>	<p>The Nature Conservancy, Rogue Climate, Melissa Cribbins - Coos County Commissioner</p>
		<p>Dedicating meaningful proceeds to benefit individuals and communities most impacted by climate change and economically distressed areas. This program offers a real opportunity to deliver investments in communities that need it most across the state while further reducing climate pollution. Proceeds should provide for a just transition for workers in affected industries, in addition to prioritizing job creation in rural and underserved communities.</p>	<p>Renew Oregon, Coalition of Communities of Color, AFL-CIO, NW Energy Coalition, Rogue Climate, Melissa Cribbins - Coos County Commissioner</p>

		Funding should support Oregon resiliency planning and projects. Climate change is creating less reliable power and water systems. Climate change adaptation projects that improve reliability of power and water systems should be one of the investment and research areas of Policy Grant Program.	EQL Energy
		We might be able to reduce opposition to the bill if some of the proceeds were directed toward helping certain hard-hit industries adapt to the new rules.	NA

Note: The "concerns" and "recommendations" columns do not correspond in each row and are independent columns. Also, we tried to capture as many comments for recommendations/concerns that relate to the Environmental Justice/Just Transition subcommittee and recognize that we may have missed a few that are related. Similarly, if any entity is seen as having similar concerns or recommendations we added it to a column as to not duplicate work but apologize if it is not the representation of any individual organization or if we missed an organization with similar concerns/recommendations.

HW Comments that Pertain to Environmental Justice/ Just Transition Workgroup Transparency

Comments			
Concerns	Entity/Entities	Recommendations	Entity/Entities
A lack of meaningful discussion on mechanisms to protect impacted communities from adverse economic consequences as a result of the policy.	Multnomah County	Building quantified terms into legislation, with scheduled reviews and resets, can show the way for other states to meet their own share of carbon reductions. Decisions on this matter are the province of legislators, our role is to present public domain information disclosing a quantified basis for assuring a habitable and therefore just environment.	Engineers for a Sustainable Future
In order for this revenue to have a significant impact in our rural communities it will be necessary for the regulatory agency to provide a clear, transparent process for organizations with an interest in developing projects – either offset projects or projects that will increase the amount of renewable energy we generate here in Oregon. Complexity and high costs associated with accessing available revenue are often market barriers for irrigation districts accessing capital to buy down the cost of our projects.	NA	I would provide more clarity about how much money will be available to invest in projects like in-conduit hydropower generation. Right now, the language in the bill is really vague and leaves a lot up to the rule-making process.	NA

<p>Does the policy promote public accountability? Climate policy should embrace inclusive, effective participation in decision-making; identify and incorporate constituencies at every stage in the process; and utilize a robust set of indicators that benchmark and measure progress on sustainability and equity goals—and quickly change policy if it does meet the grade.</p>	<p>Coalition of Communities of Color</p>	<p>Inclusive, transparent and accountable policy development and implementation. Across all provisions of this Act require robust public engagement with urban and rural most impacted communities at the state and regional/local level. This core principle of Environmental Justice ensures that those most affected by climate change play a fundamental role in designing and implementing climate solutions. This requires culturally appropriate, convenient and accessible public engagement, per Title VI of the Civil Rights Act.</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, NW Energy Coalition, OHA</p>
<p>There is a lack of a transparent decision-making structure that specifies the environmental justice mechanisms that include meaningful participation, representation, and access for impacted communities. These mechanisms must also address a just transition of jobs for impacted workers.</p>	<p>Neighbors for Clean Air</p>	<p>Elevate role of and fund Environmental Justice Task Force (EJTF) in Clean Energy Jobs. Recognize Oregon’s EJTF as key to the Act’s public accountability commitment. The EJTF was created by the Legislature to help protect Oregonians from disproportionate environmental impacts on minority and low-income populations. The EJTF encourages state agencies to give all people knowledge and access to improve decisions that affect environment and the health of all Oregonians. EJTF shall play a leadership role in the Act’s implementation and evaluation, including ensuring that impacted communities play a fundamental role in all decision-making bodies tasked with policy design, development, implementation, reporting, stakeholder engagement, and deployment of carbon pricing proceeds. Provide fee authority/funding, staff and resources to ensure EJTF can effectively engage in the above roles.</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, NW Energy Coalition</p>

<p>The accountability reporting proposed from the Public Utility Commission and the Global Warming Commission are not frequent enough. Oregon legislators and the public should get reports from the PUC and the GWC at a minimum annually to ensure that our state is on track to reduce emissions and that allowance resources are being invested in effective programs that reduce climate pollution, provide benefits for impacted communities and create jobs in rural communities. Annual reports should be available by the 15th of September so that the legislature can be fully informed prior to the start of each legislative session.</p>	<p>Rogue Climate</p>	<p>Enhanced public participation in decision making. Ensure that groups that advocate and organize with most impacted communities represent no less than half of seats on additional decision making bodies tasked with policy design, development, implementation, reporting, stakeholder engagement, and deployment of carbon pricing proceeds. Provide adequate funding to the committee to cover agency staff time and, where necessary, participant costs. Increase stakeholder engagement with DOT and other agencies, including following best practices for increasing workforce and contracting diversity. Recommendations of most impacted communities must be incorporated into final plans and recommendation.</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, NW Energy Coalition, OHA</p>
		<p>Transparent monitoring of equity outcomes. Develop and require a mechanism and/or consistent relevant criteria for measuring and reporting community reinvestment and co-benefits in most impacted communities coupled. Coupled these metrics with accountability provisions ensures effective implementation makes Oregon’s carbon pricing program accountable, transparent, and accountable. “The state should develop an annual Climate Equity Report based on tracking equity outcomes to enable state officials to monitor whether equity goals have been reached, to identify areas where climate policy should be improved to advance equity, and to hold public bodies accountable for progress on equity in GHG reduction measures.”</p>	<p>Coalition of Communities of Color, Neighbors for Clean Air, NW Energy Coalition, OHA</p>

Note: The "concerns" and "recommendations" columns do not correspond in each row and are independent columns. Also, we tried to capture as many comments for recommendations/concerns that relate to the Environmental Justice/Just Transition subcommittee and recognize that we may have missed a few that are related. Similarly, if any entity is seen as having similar concerns or recommendations we added it to a column as to not duplicate work but apologize if it is not the representation of any individual organization or if we missed an organization with similar concerns/recommendations.